BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Revision of Part 15 of the Commission's	)	ET Docket No. 98-153
Rules Regarding Ultra-Wideband	)	
Transmission Systems	)	

REPLY COMMENTS OF AMERICAN TRANS AIR, INC.

American Trans Air, Inc.
7337 West Washington Street
Indianapolis, IN, USA 46231

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American Trans Air, hereby submit their Comments on the Federal Communications Commission's ("FCC's" or "Commission's") *Notice of Proposed Rulemaking* in the Matter of Revision of Part 15 of the Commission's Rules Regarding Ultra-Wideband Transmission Systems, released May 11, 2000 ("*UWB NPRM*").[1]

American Trans Air, the 11th largest U.S. passenger airline providing both scheduled and charter service worldwide. American Trans Air, in its 27 th year, operates a fleet that includes Boeing 727s, Boeing 757s and Lockheed L-1011s.

[1] *In the Matter of Revision of Part 15 of the Commission's Rules Regarding Ultra-Wideband Transmission System*, ET Docket 98-153, Notice of Proposed Rulemaking (rel. May 11, 2000).

The purpose of this comment is not to add to the growing body of technical data but instead to request the Commission to carefully consider the impact of UWB deployment in terms of effects upon safety of life frequencies, especially those involved in Communication, Navigation and Surveillance ("CNS") systems, which are critical to the safe and efficient operation of the global aviation industry.

We are well aware of the many potential uses and benefits of this new technology realizing that if deployed under Part 15 regulations these devices will permeate modern society much as the microprocessor has. The impact of millions of UWB devices operating in essentially an unregulated environment on safety of life frequencies, and GPS in particular, remains a matter of concern and controversy. In the event that UWB proves detrimental to GPS either by direct interference, or by raising the noise floor, the future of modern navigation in the National Airspace System will be in jeopardy. This will effect not only enroute navigation but the critical approach and landing phases as well (WAAS, LAAS). Because of these risks we believe that UWB devices should not be allowed to radiate in any of the safety of life bands under Part 15 at this time. Additional efforts must be put forth to further understand the science involved in spectrum management based on the time domain as opposed to the current frequency band paradigm. It is hoped that the Commission will promote independent and unbiased testing to achieve these goals.

The task before the Commission, we believe, is to weigh not the benefits of a yet to be deployed immature technology but the costs involved in scrapping GPS as the basis for air navigation due to a judgement based on politics rather than science.

Respectfully submitted,

AMERICAN TRANS AIR, INC.

By _____

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